

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of:	)	
	)	
Amendment of Sections 74.1203(a)(3) and	)	RM No. 11786
74.1204(f) of the Commission's Rules to	)	
Protect Local Radio Service Provided by	)	
Fill-In Area FM Translators	)	

To: The Commission

**COMMENTS OF JOSE GONSALVES**

**I, Jose Gonsalves**, am submitting these Comments in the above-captioned Petition for Rulemaking pursuant to Public Notice Report No. 3074 which was released on April 18, 2017.

I am a regular listener to a full-power station in New Bedford, Massachusetts. The station is WJFD, a Class B station broadcasting at 97.3 MHz with 50,000 watts. I live exactly 67.7 air miles from the WJFD transmitter. This is the equivalent of 109 kilometers. According to the FCC Curves F(50,50) calculation tool on the FCC's website, WJFD is only supposed to provide a 36.972 dBu signal at my house. But this number is misleading. WJFD comes in perfectly clear and sharp on my home stereo, my car radios, and even my clock radio. It probably has to do with the terrain.

I have enjoyed listening to WJFD for many years. Giving a translator fanatic the right to interfere with WJFD would be devastating for me. If the FCC decided to limit protection of WJFD to a protected contour plus an extra 6-dB buffer zone, I would be left out in the cold. Such an approach is flawed because it doesn't consider terrain, which is by far the biggest factor in determining FM signal strengths. Also, as a practical matter, this would be a terrible, non-working

compromise for me. It would only result in an additional 7 miles of protection for WJFD, or extend the translator-protected area from about 34 miles to 42 miles, which falls far short of doing any good for me. This would also be a very short-sighted move because, practically speaking, the WJFD signal is perfectly good where I live.

When it comes to interference between a full-power station and a translator, the existing laws do not say that the interference must be in the protected contour of the full-power station for remediation to occur. Not at all. The existing laws protect the full-power station from translator interference in places where the full-power station can be heard by listeners. This is not out to Mars, or any other far-out location. The listener requirement is what places a maximum limit on the protection zone of a full-power station against a translator. This is as it should be. If the FCC wants to make it more objective, they could set a minimum signal strength level at which listeners would not be likely to listen. But I can tell you from first-hand experience that a 54-dBu or a 48-dBu threshold is MUCH too low, especially if the F(50,50) curves are being used, and considering my situation and the situation of many other listeners throughout the US. I am at the 37-dBu contour (determined using F(50,50)), and WJFD comes in loud and clear. This type of reception deserves continued protection.

Why should the FCC allow a new translator station to drop itself right on top of an existing broadcaster? This would really make the translator a primary station compared to the full-power station. The translator could just pick out the most desirable population currently being served by the full-power station and if happens to be outside of the protected full-power contour (even adding an almost meaningless 6-dB buffer), POOF! The full-power station is now replaced by an AM translator that can also be heard on the AM band.

If the translator fanatics want to make their translators into full-power stations, they should have bidden in the FCC auctions to get a full-power station. But they would rather get a translator for free, and then use it as a sword to destroy long-time full-power stations that have provided extended coverage for many years.

The FCC really opened up a can of worms here. It shows that no good deed goes unpunished. The FCC decided to give translators away to AM stations, almost for free, and allowed the translators to "extend" their coverage by giving them the freedom to relocate within a 250-mile radius. What full-power station wouldn't welcome the opportunity to move THEIR transmitter anywhere within 250 miles?

The translator fanatics are not being good citizens. By their actions, they have shown that they are very ungrateful. They do not want to get along with others who have used the same frequency for many years. Instead they deny that the full-power station was serving the area, and they hire expensive lawyers to spin things into the translator's favor.

For all of the above reasons, Aztec's Petition must be denied.

Saludos,

**Jose Gonsalves**

18 Baxter St.  
Worcester, MA 01602  
Gonsalves@engineer.com

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